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Attorney for Plaintiff

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

DANIELLE BRINKMAN,

Plaintiff,

v.

KILOLO KIJAKAZI¹,
COMMISSIONER OF SOCIAL SECURITY,

Defendant.

CASE NO. 2:21-cv-00528-EJY

**CONSENT MOTION
FOR EXTENSION OF TIME TO FILE
PLAINTIFF'S BRIEF**

Plaintiff, Danielle Brinkman, by her attorney, Hal Taylor, Esq., Of Counsel, Olinsky Law Group, hereby moves for a sixty-day extension of time to file Plaintiff's Opening Brief.

Plaintiff's opening brief is currently due to be filed September 20, 2021.

Due to the backlog of transcripts created by COVID-19 and the Commissioner's response, the Commissioner is able to produce records at a rapid pace. As a result, this has caused multiple, simultaneous filing deadlines that cannot be met by Plaintiff's Counsel.

Wherefore, Plaintiff requests an extension from September 20, 2021 up to and including

¹ Kilolo Kijakazi became the Acting Commissioner of Social Security on 7/9/2021. Pursuant to Rule 25(d) of the Federal Rules of Civil Procedure, Kilolo Kijakazi should be substituted for Andrew Saul as the Defendant in this suit.

1 November 19, 2021 to file her brief. Counsel for the Plaintiff has conferred with Defendant's
2 Counsel who kindly has no objection to this request.

3 Dated this 15th day of September, 2021.

4 Respectfully submitted,

5 /s/Hal Taylor

6 Hal Taylor, Esq.
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14 **Plaintiff's Certificate of Service:**

15 I certify that I caused the Motion for Extension of Time to be served today, September
16 15, 2021, by CMECF to Allison Cheung, Esq., and Blaine T. Welsh, Esq., who are filing users of
17 the CM/ECF system.

18 /s/Hal Taylor

19 Hal Taylor, Esq.

20 IT IS SO ORDERED.

21 
22 U.S. MAGISTRATE JUDGE

23 Dated: September 16, 2021